

File

1199012 - R8 SDMS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8ENF-RC

August 12, 2009

Mr. Jon Nickel
Asarco East Helena Plant
100 Smelter Road
P.O. Box 1230
East Helena, MT 59635

RE: Strategy for Further Groundwater Investigations
Asarco Smelter Facility, East Helena, Montana

Dear Mr. Nickel:

We have reviewed the proposed actions outlined in your August 3, 2009, letter, and have consulted with Mr. Stimson and Ms Kirkpatrick with the Montana Department of Environmental Quality (MDEQ). We are approving your proposed sampling program with the following additions:

- 1) Please sample the Saint Peter's Hospital, Shodair Hospital, and Touchstone Living wells that are located on the east side of Helena, about two miles southwest of Seaver Park. These wells are located near and penetrate an isolated deposit of the same volcanic ash (Oligocene Volcanic rocks) that Seaver subdivision is located on. If the arsenic detected at Seaver Park is background and originating from the ash layer, then background arsenic should show up in other areas where the layer is present and where arsenic from Asarco would not be expected to be found.
- 2) The Metcalf building in which MDEQ is housed and the adjacent areas are also located on the volcanic deposit. Please identify existing private wells in this area and sample them to test the background theory.

Please submit your proposed locations for installation of additional monitoring wells for our review and approval. Implementation of this plan, as approved, would qualify for credit from the custodial trust should one be established. If you have questions on this letter or any related matter, please contact me at (303) 312-6503.

Sincerely,

Linda Jacobson
RCRA Enforcement

cc: Denise Kirkpatrick, MDEQ
Jim Stimson, MDEQ
Randy Breeden, EPA-Region 8
Dr. Richard Wilkin, EPA-ORD